

September 9, 2010

Richard Hall
GSA Federal Center South
400 15th St SW
Auburn, WA 98001

RE: Results of the Urban Waters Environmental Compliance Inspection at GSA Federal Center S. on August 3, 2010

Dear Mr. Hall:

I appreciated your cooperation during my visit to your facility at 4735 E Marginal Way S.

As you know, Governor Christine Gregoire has made the cleanup of Puget Sound a priority for Ecology. The Urban Waters Initiative strengthens efforts to identify sources of pollution in and around Puget Sound by working with businesses to address those sources.

Based on my visit, it appears your facility is in compliance with most of the inspection items I look for. However, I identified several items that should be addressed which are detailed in the enclosed inspection report.

Ecology authority. During my inspection, you had questions about the Department of Ecology's jurisdiction on federal property. In the State of Washington, the US Environmental Protection Agency (USEPA) authorized Ecology for the Resource Conservation and Resource Act (RCRA) Program on January 30, 1986. The State regulatory program operates in lieu of all portions of the Federal RCRA program for which the State has been authorized. All persons who generate, transport, transfer, recycle, treat, store, or dispose of dangerous wastes, as defined in the Dangerous Waste Regulations, Chapter 173-303 Washington Administrative Code (WAC), are affected. The State program, administered by Ecology, has regulatory authority over nearly all areas of dangerous waste management, including notification, inspection, monitoring, permitting, compliance monitoring, manifest tracking, corrective action and enforcement.

Generator responsibilities. You mentioned that the General Services Administration (GSA) had hired a contractor that was responsible for some hazardous waste identification and disposal activities at your facility. Please note that long-standing Ecology guidance as found in Technical Information Memorandum (TIM) 84-5, *Assigning ID Numbers to Multiple Generators on One Site*, states:

"In the case of a single, geographically contiguous property owned, operated or controlled by a single person [individual/corporation/government agency], there will actually be only one generator. Thus, only the person who owns, operates, or controls the site is the generator, even though that person may hire several independent operators each of whom produces dangerous waste.... Any individuals working on the site, under written contract or similar agreement with the owner or operator of the site, would then use this one ID number for any, manifests, reports, etc. associated with the dangerous wastes they produced."

• City of Bellevue	• Snohomish Health District	• Seattle Public Utilities	• Kitsap Co Public Works
• Clallam Co Health & Human Svcs	• City of Bellingham	• Tacoma-Pierce Co Health Dept	• Skagit Co Public Health Dept
• King Co Water & Land Resources	• Jefferson Co Public Health	• City of Issaquah	• Spokane Regional Health Dist
• San Juan Co	• Kitsap Co Health District	• King Co Public Health Div	• Whatcom Co Health Dept

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Mr. Richard Hall
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In the October 30, 1980 Federal Register, USEPA coined the term "co-generators" to describe this situation. Applicable guidance includes the need for discussion between owners, operators, contractors, et al with the intent of reaching agreement as to which party will assume generator responsibilities. Ecology's experience over the years has shown that owner/operators are usually the most stable, invested, and permanent members of these temporary associations and, thus, most likely to assume the generator responsibilities for all concerned parties.

Site regulatory history. After several years of reporting zero waste generated, GSA withdrew their RCRA number in 2008. In 2010, in association with the disassembly and demolition work at building 1202, GSA has accumulated larger quantities of potential hazardous wastes. During my inspection, you said you didn't believe your generator status would change. However, once the waste designation process is completed for the increased quantities and types of wastes currently accumulated on site, you may find GSA meets the definition of a medium or large quantity generator (MQG or LQG) with increased regulatory requirements. For example, MQGs and LQGs have additional requirements for annual reporting, container accumulation and emergency response. I recommend you review the enclosed guidance entitled *Guide for Dangerous Waste (DW) Generators in Washington State* for further information on these requirements.

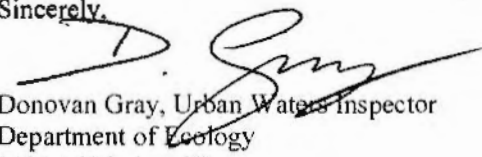
Once GSA has designated the waste on site and determined the current generator status for the facility, the compliance timelines, and generator requirements will be clear. I plan to return for a follow-up inspection and will provide you with a second report with more detailed compliance requirements at that time.

Although Ecology's Water Quality Program does not have jurisdiction over stormwater management on federal facilities, stormwater observations are included in my report to assist your future stormwater compliance work.

It is your responsibility to comply with the requirements of the applicable environmental codes, ordinances, and regulations. Please be aware that any uncorrected violations of the Dangerous Waste Regulations are subject to enforcement action by Ecology, including the issuance of an administrative order and/or penalty.

If you have any questions or concerns, please contact me at (425) 649-7055 or email me at DOGR461@ecy.wa.gov.

Sincerely,



Donovan Gray, Urban Waters Inspector
Department of Ecology

3190 160th Ave SE
Bellevue, WA 98008

DG:SA

Enclosure: Inspection Report
Guide for Dangerous Waste (DW) Generators in Washington State

By certified mail: 7009 2820 0001 7154 0176

INSPECTION REPORT

*If you have any questions about information in this Inspection Report, please call:
Donovan Gray at (425) 649-7055*

The problems identified below must be corrected in order to be in compliance with Washington Dangerous Waste Regulations (Chapter 173-303 WAC), or other environmental laws or regulations.

Issues and Concerns

1) Properly designate and dispose of your waste

I found several pallet loads of unknown material in your temporary waste accumulation area in the building you referred to as "1202". You said this was material that previous tenants had left behind when they vacated the building. You mentioned that as the disassembly of the northern part of the building progressed it was possible that more abandoned wastes would be found and moved to this temporary accumulation area.

All facilities must identify their dangerous wastes and dispose of them appropriately. Designation can be done through knowledge or testing. See Ecology's guidance, *Dangerous Waste Identification / Designation*, for further help on indentifying your waste:

http://www.ecy.wa.gov/programs/hwtr/demodewbris/pages2/designat_summary.html

I also recommend* that you:

- Label containers with the words "waste pending designation" until you determine the contents.
- Keep copies of test results and analyses of your waste(s), both designated and non-designated. These are important to keep in your files to ensure that designation has occurred and to document the decision making process for waste designation. You are responsible for your waste from "cradle to grave" and will be liable for any damage your waste may cause if mishandled and disposed of improperly.

*If you are a small quantity generator of dangerous wastes – always generating <220 pounds of dangerous waste (about half a 55-gallon drum) per month and never accumulating >2,200 pounds of dangerous waste on the entire site -- these are voluntary best management practices. However, you at least need to follow enough of these guidelines to show you are protecting human health and the environment. If you are a medium or large quantity generator, these are requirements.

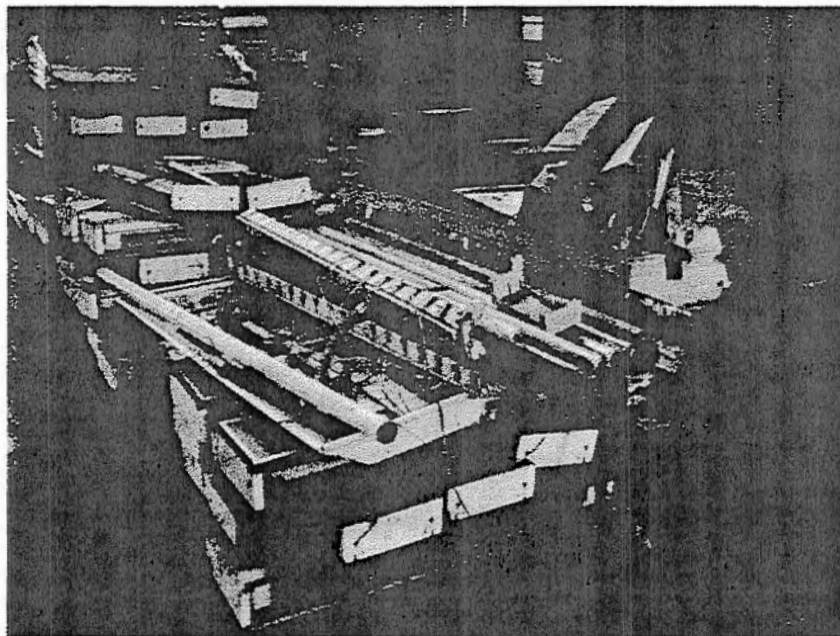
Please provide me with documentation showing what you did to designate your waste streams. This may include copies of the analytical results of designation testing, any contracts with testing laboratories, or any other information that helped you designate your waste.

2) Properly Store Waste/Product

Some waste was stored improperly in the temporary waste accumulation area in building "1202"



During my inspection I found two 55-gallon drums of what appeared to be solvent without lids. In addition, your used fluorescent lamps were not stored appropriately. See this guidance for what is expected regarding lamp storage: <http://www.ecy.wa.gov/pubs/98407c.pdf>



Other inspectors with the US Environmental Protection Agency (USEPA) who accompanied me also noted that one waste drum was bulging. None of the liquid waste appeared to have secondary containment. I recommend you inspect all your waste containers regularly (weekly) to ensure they are stored appropriately.

Specifically I recommended* that you:

- Have a storage area with containment to control spills and leaks from tipped, overfilled, or ruptured containers. This is especially true if these waste materials are stored outside. If there is a potential for environmental damage from release of your product, it may be infinitely cheaper to use secondary containment than to respond to a spill to the stormdrain or sewer.
- Have containers that are in good condition and stay that way.
- Protect your containers from damage or exposure to the environment with a proper cover.
- Store your waste in closed drums and containers when you are not dispensing from or filling them to prevent accidental spills and exposure to toxic and flammable vapors.
- Have containers that are properly labeled so you always know the contents and hazards.
- Repair or replace degraded open chemical containers. Check your waste containers at least once a week for leaks, rust or other defects.
- Choose a container for accumulating your waste that is made of a compatible material. For example, use polyethylene drums for corrosive wastes (strong acids and bases) rather than metal containers.
- Do not put incompatible wastes in the same container or the same containment.
- Look for leaking containers and for deterioration of containers or your containment system.
- Comply with the fire code for the proper storage of hazardous materials.

Please see the following guidance for further information on proper storage and container management: <http://www.ecy.wa.gov/pubs/0804015.pdf>
<http://www.ecy.wa.gov/pubs/91120.pdf>

*If you are a small quantity generator of dangerous wastes, all but the last item are voluntary best management practices. However, you at least need to follow enough of these guidelines to show you are protecting human health and the environment. If you are a medium or large quantity generator of dangerous wastes, you must properly accumulate your waste in compliance with the Dangerous Waste Regulations.

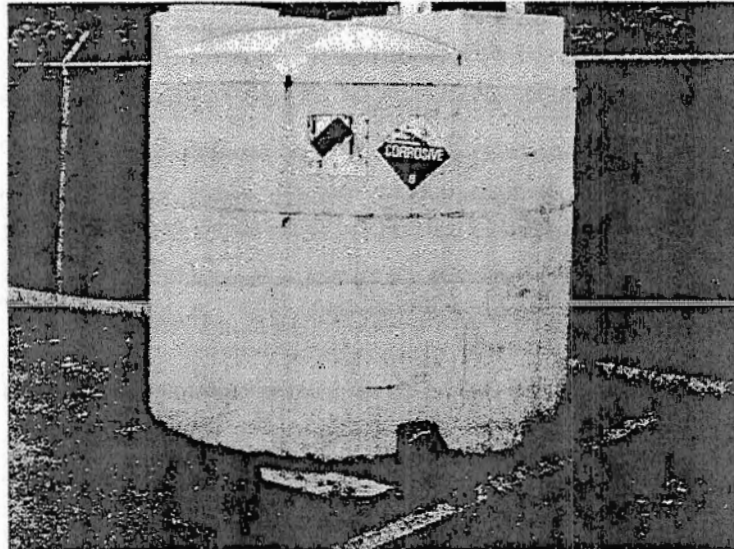
3) Properly dispose of waste

Although you generate small quantities of hazardous waste on a monthly basis, you may have accumulated over 2,200 pounds on-site. If you find after testing and designation of your waste that you are a medium or large quantity generator, you must comply with the Dangerous Waste Regulations and:

- Complete a "Dangerous Waste Site Identification Form" to reactivate your site EPA/State ID# (accessible at <http://www.ecy.wa.gov/pubs/ecy070133.doc>; also enclosed).
- Arrange and complete the process of disposal at a permitted facility (options at <http://www.ecy.wa.gov/apps/hwtr/hwsd/default.htm>).
- Submit copies of manifests documenting disposal when you receive the signed copy of the manifest from the disposal facility.

4) Properly manage empty containers

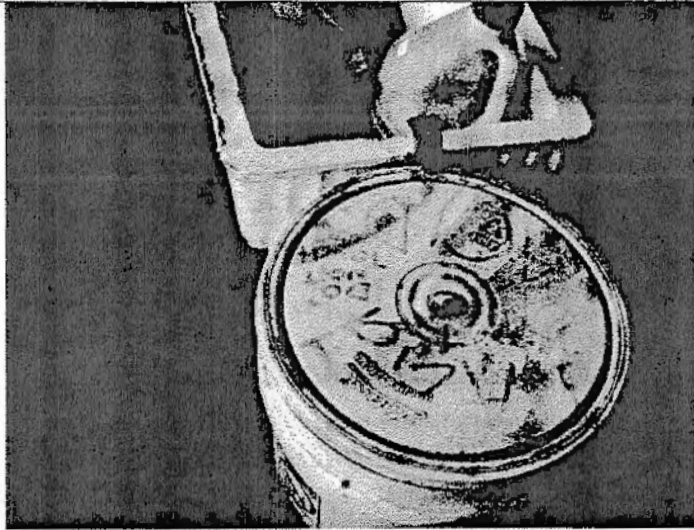
I found a large container stored outside with a 'corrosive' label.



You stated that this container was owned by the National Oceanic and Atmospheric Administration (NOAA) and that it was your understanding that this container was empty and no longer in use. Empty containers need to be stored and labeled appropriately. Please see the following guidance for further detail: <http://www.ecy.wa.gov/pubs/96431.pdf>

5) Improve or create spill response procedures

You stated that you did not have a spill kit at your temporary waste accumulation area. Given the quantities and types of wastes you have on site, I highly recommend you purchase a spill kit and establish proper spill response procedures. Make sure that the spill materials in your kit are appropriate for the wastes you have on site. For example, I found several containers labeled 'acid' so your spill kit should contain neutralizing agents.



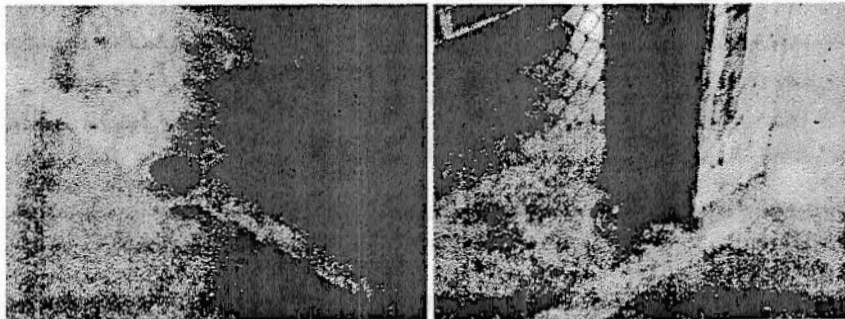
Also, post the State of Washington spill reporting emergency telephone number by your phone (1-800-258-5990). Also post internal emergency contacts and telephone numbers.

If there is the potential for pollutants to reach water or soil from your facility, stage spill control products within easy access for employees to use. When practical, store potential pollutants in secondary containment.

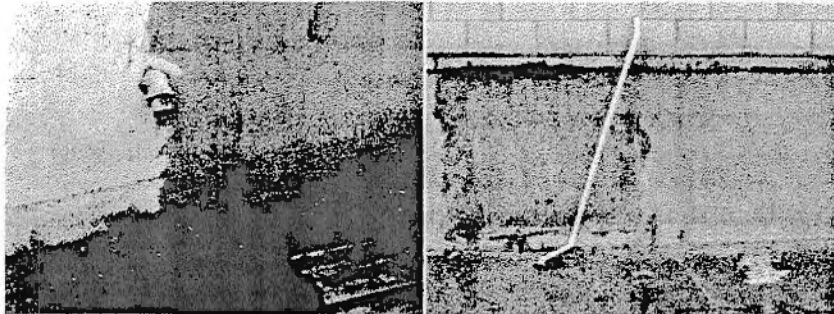
Educate all staff on necessary procedures to manage a spill safely. Create and implement an annual refresher training program.

6) Correct plumbing connections

During my inspection I found what appeared to be floor drains scattered throughout building '1201'. At the time of the inspection you did not know the function of these structures or where they terminated. Considering these were located adjacent to internal roof rain gutters, I believe it is possible these are connected to your storm drainage system. Only stormwater should be directed to storm drainage systems. If you are not able to determine where these structures drain I recommend you seal them.

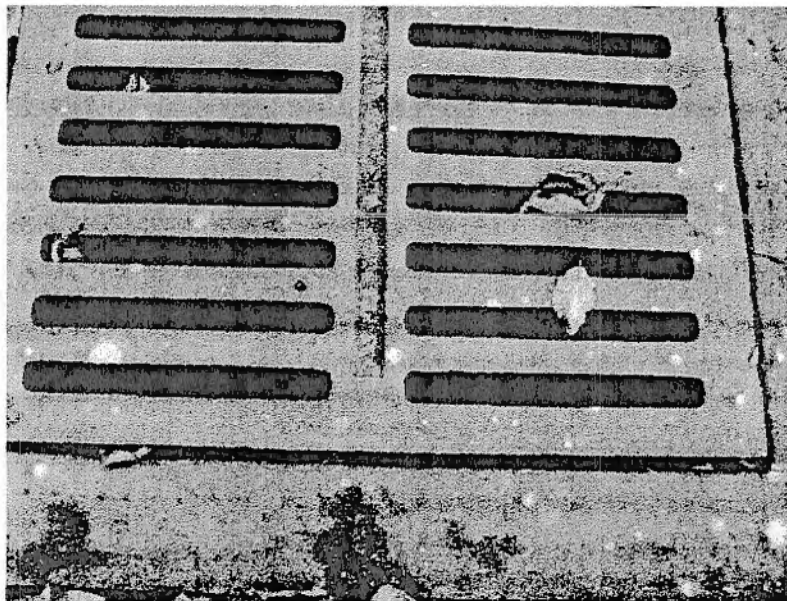


I also found several pipes exiting the west side of building '1201' and terminating on the asphalt outside. The walls and asphalt near some of these pipes were stained which may indicate a discharge. As with the floor drains above only stormwater should be directed to your storm drainage systems. You need to show these pipes do not discharge or have them sealed.



7) Storm drain maintenance

During my inspection I found some storm catch basins west of building '1202' that needed cleaning. If you look closely at the photo below you'll see that sediment has almost completely filled this catch basin.

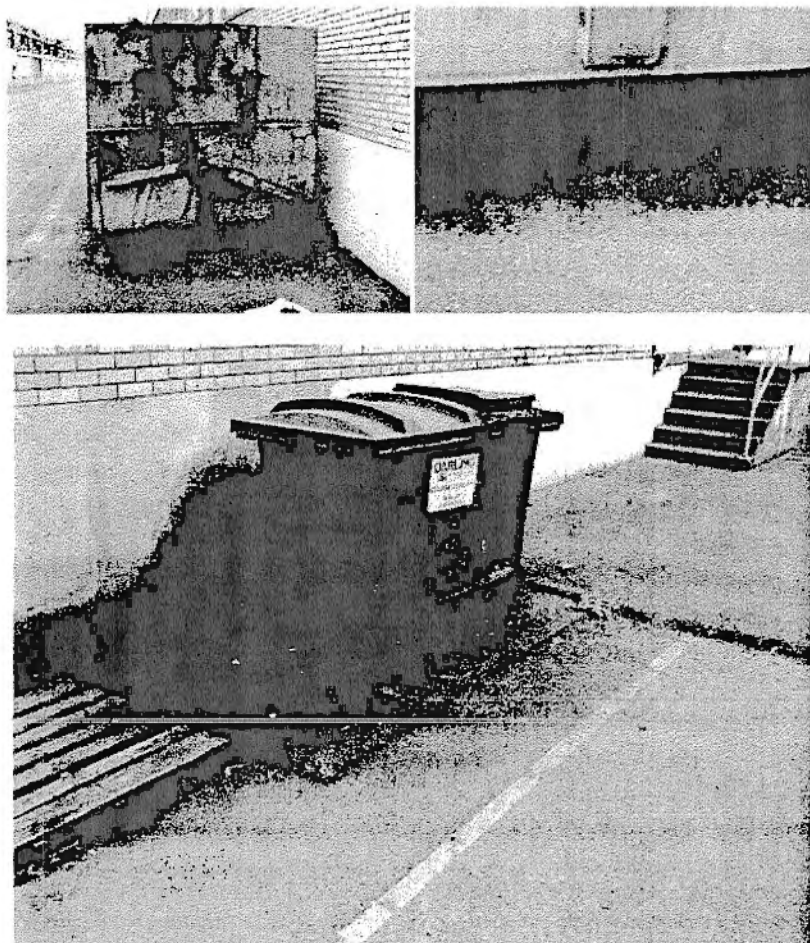


Considering the disassembly and demolition work you're doing at the north end of building '1202' you may find sediment accumulating in your catch basins faster than normal. I recommend that you:

- Do not allow sediments and/or debris to exceed 60% of the catch basin depth.
- Do not allow sediments and/or debris to restrict or block the stormdrains. Remove sediments and debris on a regular basis.

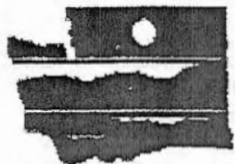
8) Implement proper housekeeping

Although, I found the housekeeping inside your shop to be generally good, you could make improvements throughout your facility. For example, one of your dumpsters appeared to be leaking and there was staining around your food grease storage container.



- Increase the frequency of lot sweeping.
- Dispose of excess waste and old equipment promptly and properly.
- **Cover dumpsters. Check dumpsters for leaks and drips.**
- Clean up leaks and spills as they occur and employ the spill plan when necessary.
- Repair leaking equipment and vehicles.

	Large Quantity Generator (LQG) Generates > 2,200 lbs/mo DW or 2.2 lbs/mo of Acute Hazardous Waste (AHW) or WT01 (EHW)	Medium Quantity Generator (MQG) Generates 220-2,200 lbs/mo	Small Quantity Generator (SQG) Generates <220 lbs/mo DW or <2.2 lbs/mo of Acute Hazardous Waste (AHW) or WT01 (EHW)
Preparedness and Prevention	<ul style="list-style-type: none"> Minimize fire, explosion, release. Communication systems (internal and external), fire control. Test/maintain communication and control equipment. Access to communications or alarm system. Adequate aisle space. Arrangements with local authorities. WAC 173-303-200(1)(e),340	<ul style="list-style-type: none"> Minimize fire, explosion, release. Communication systems (internal and external), fire control. Test/maintain communication and control equipment. Access to communications or alarm system. Adequate aisle space. Arrangements with local authorities. WAC 173-303-200(1)(e),340	Not required. WAC 173-303-070(8)
Contingency Plan and Emergency Procedures	<ul style="list-style-type: none"> Written plan. Arrangements with local emergency response agencies (ER). Emergency coordinator (EC) (phone, address). Emergency equipment list. Evacuation plan. Plan distribution to police, fire departments, hospitals, and local agencies. Plan must be amended if it fails in an emergency or there are changes in the facility, equipment, or personnel. EC must respond. WAC 173-303-200(1)(e),350,360	<ul style="list-style-type: none"> Emergency coordinator (EC) onsite/on call. Post: location of EC phone. Post: Location of fire extinguishers/spill control/fire alarm. Post: Fire department phone. Familiarize employees with plan and emergency procedures. EC must respond. WAC 173-303-201(2)(c)	Not required. Check L&I/DOSH. WAC 173-303-070(8)
Additional Reporting for Emergencies	Report spill, fire, explosion, release. WAC 173-303-145,200(1)(e),360	Report spill, fire, explosion, release. WAC 173-303-145,201(2)(c)(iv)	Report spills if threat to human health and the environment. WAC 173-303-070(8)(b)(ii),145
Waste Containers	<ul style="list-style-type: none"> Good condition. Non-leaking. Compatible with waste. Closed/protected. 30" aisle space. Response to spills. Leaks, emergencies. Weekly inspections. Ignitable, reactive, incompatible waste. Containment system. WAC 173-303-200(1)(b),630(2)(3),(4),(5),(6),(7)(a),(8),(9),(10)	<ul style="list-style-type: none"> Good condition. Non-leaking. Compatible with waste. Closed/protected. 30" aisle space. Response to spills. Leaks, emergencies. Weekly inspections. Ignitable, reactive, incompatible waste. Containment system. WAC 173-303-200(1)(b),630(2)(3),(4),(5),(6),(7)(a),(8),(9),(10)	Manage waste in way that does not pose a threat. Local regulations may apply. WAC 173-303-070(8)



**DEPARTMENT OF
ECOLOGY**
State of Washington

Guide for Dangerous Waste (DW) Generators in Washington State

Quick Reference Guide

Publication #98-1252 - HWTR

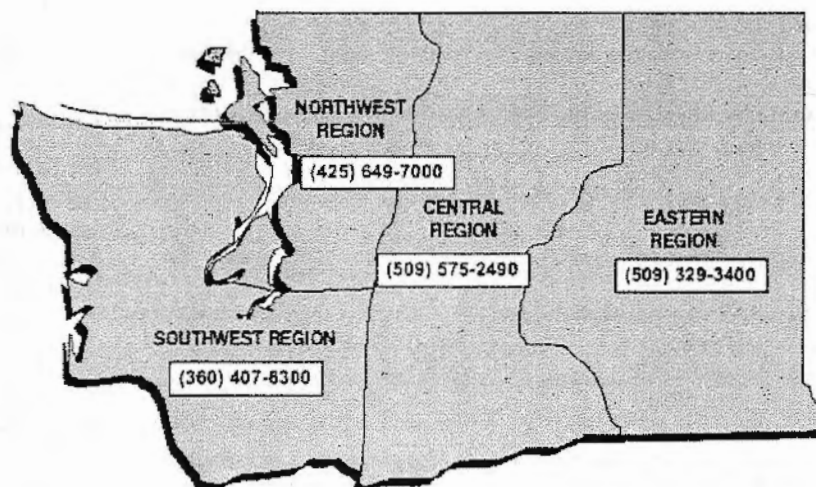
Revised July 2008

Dangerous Waste Regulations			
	Large Quantity Generator (LQG) Generates > 2,200 lbs/mo DW or 2.2 lbs/mo of Acute Hazardous Waste (AHW) or WT01 (EHW)	Medium Quantity Generator (MQG) Generates 220-2,200 lbs/mo	Small Quantity Generator (SQG) Generates <220 lbs/mo DW or <2.2 lbs/mo of Acute Hazardous Waste (AHW) or WT01 (EHW)
Dangerous Waste Designation	Determine if waste is covered by regulations. WAC 173-303-070-100,170(1)	Determine if waste is covered by regulations. WAC 173-303-070-100,170(1)	Determine if waste is covered by regulations. WAC 173-303-070(8),070-100,170(1)
Identification Number and Required Notices	File DW Site Identification Form to notify and obtain ID number. WAC 173-303-060,170	File DW Site Identification Form to notify and obtain ID number. WAC 173-303-060,170	Not required. WAC 173-303-070(8)
Labeling, Marking of Waste During Accumulation	DW label with start date, risk label (major risks ignitable, corrosive, toxic). WAC 173-303-200(1)(c),(1)(d)	DW label with start date, risk label (major risks ignitable, corrosive, toxic). WAC 173-303-200(1)(c),(1)(d)	Major risk label required by L&I/DOSH and some local Health Departments. WAC 173-303-070(8)
Waste Generation Amount	More than 2,200 lbs/mo DW or more than 2.2 lbs/mo Acute Hazardous Waste (AHW) or WT01 (EHW).	Between 220 lbs/mo and 2,200 lbs/mo.	Less than 220 lbs/mo DW less than 2.2 lbs/mo AHW or WT01 (EHW).
Waste Accumulation Amount	No volume limit. WAC 173-303-200(1)	Not to exceed a total of 2,200 lbs. WAC 173-303-201(1),(2)	Not to exceed a total of 2,200 lbs. WAC 173-303-070(8)(a)
Accumulation Time Limit	90 days. WAC 173-303-200	180 days. WAC 173-303-201(2)(a)	No limit. WAC 173-303-070(8)
Satellite Accumulation Areas	55 gallons DW or 1 quart AHW. WAC 173-303-200(2)	55 gallons DW or 1 quart AHW. WAC 173-303-200(2)	Does not apply.
Accumulation Area Inspections	Must be scheduled, documented, and deficiencies corrected. WAC 173-303-200(1)(b),320(1),(2)(a),(b),(d),(3) 630(6),640(6)(d).	Must be scheduled, documented, and deficiencies corrected. WAC 173-303-201,320(1),(2)(a),(b),(d),(3) 630(6), 202	Not required. WAC 173-303-070(8)
Personnel Training	Required written plan. WAC 173-303-200(1)(e),330	Not required by 201(2) (b), but Hazard Communications required by L&I/DOSH. Also see Cont. Plan & Emergency Procedures below. WAC 173-303-201(2)(b)	Not required by DW regulation, but Hazard Communications required by L&I/DOSH. WAC 173-303-070(8)

	Large Quantity Generator (LQG) Generates > 2,200 lbs/mo DW or 2.2 lbs/mo of Acute Hazardous Waste (AHW) or WT01 (EHW)	Medium Quantity Generator (MQG) Generates 220-2,200 lbs/mo	Small Quantity Generator (SQG) Generates <220 lbs/mo DW or <2.2 lbs/mo of Acute Hazardous Waste (AHW) or WT01 (EHW)
Waste Tanks	<ul style="list-style-type: none"> Assessment. Design, installation. Containment, release, direction. Operating requirements. Daily inspections. Response to spills, leaks. Closure, post closure. Ignitable, reactive, incompatible waste. WAC 173-303-200(1)(b), 640 except (8)(a), (8)(c)	<ul style="list-style-type: none"> Operating requirements. Daily/weekly inspections. Closure, post closure. Ignitable, reactive, incompatible waste. Freeboard requirement. WAC 173-303-202	Local regulations may apply. WAC 173-303-070(8)
Disposal of Dangerous Waste	Ship to permitted TSD or DW recycler. Uniform Manifest Form required. WAC 173-303-200(1)(a)	Ship to permitted TSD or DW recycler. Uniform Manifest Form required. WAC 173-303-200(1)(a)	Ship off-site or treat on-site: permitted TSD or permitted to manage moderate risk waste or legitimate recycle or other permitted solid waste facility. WAC 173-303-070(8)
Manifest	Use for shipments off-site. WAC 173-303-180	Use for shipments off-site. WAC 173-303-180	Not required – only bill of lading. WAC 173-303-070(8)
Packaging, Labeling, Marking for Transport	Package, label and mark per USDOT (49 CFR). WAC 173-303-190(1), (2), (3), (5), (6)	Package, label and mark per USDOT (49 CFR). WAC 173-303-190(1), (2), (3), (5), (6)	Refer to DOT Regulations. WAC 173-303-070(8)
Placarding for Transport	Must offer placard. WAC 173-303-190(4)	Must offer placard. WAC 173-303-190(4)	Refer to DOT Regulations. WAC 173-303-070(8)
Annual Reporting	File every year. WAC 173-303-220(1), 390(2)	File every year. WAC 173-303-220(1), 390(2)	File every year, if have ID#. Site Identification form only. WAC 173-303-070(8)(b)(iv), 220(1)
Exception Reporting	45 days: if no signed manifest from TSD returned. WAC 173-303-220(2)	45 days: if no signed manifest from TSD returned. WAC 173-303-220(2)	Not required. WAC 173-303-070(8)
Recordkeeping	5 years: manifests 5 years: annual reports, exception reports, test results. WAC 173-303-210(1), (2), (3)(a)	5 years: manifests 5 years: annual reports, exception reports, test results. WAC 173-303-210(1), (2), (3)(a)	Not required, but encouraged. WAC 173-303-070(8)
Waste Minimization	<ul style="list-style-type: none"> For generators > 2,640 lbs/yr: plan to minimize waste required. Written plan and program in place to minimize hazardous waste volume, toxicity. Submit executive summary to WDOE. 5 year updates. WAC 173-307	<ul style="list-style-type: none"> Good faith effort to minimize waste and selected best waste management method. For generators > 2,640 lbs/yr: Plan to minimize waste required. Submit executive summary to WDOE. 5 year updates. WAC 173-307	Not required.

	Large Quantity Generator (LQG) Generates > 2,200 lbs/mo DW or 2.2 lbs/mo of Acute Hazardous Waste (AHW) or WT01 (EHW)	Medium Quantity Generator (MQG) Generates 220-2,200 lbs/mo	Small Quantity Generator (SQG) Generates <220 lbs/mo or <2.2 lbs/mo DW of Acute Hazardous Waste (AHW) or WT01 (EHW)
Recycled, Reclaimed, Recovered Waste	Depending on the circumstances, recycled used oil, recycled car batteries, other recycled wastes partially or fully exempt. WAC 173-303-120,500-525	Depending on the circumstances, recycled used oil, recycled car batteries, other recycled wastes partially or fully exempt. WAC 173-303-120,500-525	Depending on the circumstances, recycled used oil, recycled used batteries, other recycled wastes partially or fully exempt. WAC 173-303-120,500-525
Regulating Agency	Ecology	Ecology	Ecology / County Health District
Universal Waste	Standards for universal waste management (batteries, mercury-containing equipment, and lamps). WAC 173-303-573	Standards for universal waste management (batteries, mercury-containing equipment, and lamps). WAC 173-303-573	Standards for universal waste management (batteries, mercury-containing equipment, and lamps). WAC 173-303-573

While this Quick Reference Guide summarizes the requirements for each generator status under the *Dangerous Waste Regulations* (Chapter 173-303 WAC), it does not replace them. Always refer to the regulations themselves for more detail or call a hazardous waste specialist at your nearest Ecology Regional Office.



If you need this information in an alternate format, please call the Hazardous Waste and Toxics Reduction Program at 360-407-6700. If you are a person with a speech or hearing impairment, call 711, or 800-833-6388 for TTY.



13228 NE 20th Street, Suite 100
Bellevue, WA 98005

425-455-2959

Date 28906
08/13/2010

ALASKA

Description	Contract Amount	Percent Completed	Prior Billed	Total Billed	Current Billed
	2,058.00			2,058.00	2,058.00
(AK031ZZ)					
	3,344.00			3,344.00	3,344.00
	3,248.00			3,248.00	3,248.00
	3,778.00			3,778.00	3,778.00
	3,211.00			3,211.00	3,211.00
Total	15,639.00	100.00	0.00	15,639.00	

72332

